

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-125-E

IN RE:)	
Application of Dominion Energy South)	Dominion Energy South Carolina's First
Carolina, Incorporated for Adjustment of)	Set of Written Interrogatories and Request
Rates and Charges)	for Production of Documents and Things
)	to the United States Department of Defense
)	and all Other Federal Executive Agencies
_____)	

Pursuant to South Carolina Regulation 103-833, Dominion Energy of South Carolina, Inc. (DESC) respectfully submits its First Set of Written Interrogatories and Requests for Production of Documents and Things to the United States Department of Defense and all Other Federal Executive Agencies.

Instructions

1. Responses should be provided within 20 days in writing and under oath, as specified in Regulation 103-833.
2. These requests are continuing in nature and require you to supplement or amend your answer in a timely manner if you learn that the answer is incorrect or incomplete or if you identify additional documents or information responsive to the request.
3. Where knowledge, information, or documents are requested, such request encompasses knowledge, information, or documents in your possession, custody, or control, or in the possession, custody, or control of your staff, agents, employees, representatives, expert witnesses and consultants, and, unless privileged, attorneys.

4. If you object to a portion of any request, state the grounds of your objection with specificity and answer the remainder of the request. Objections on account of vagueness should specifically explain why you believe the request is vague and should state your understanding of the information being sought along with a response consistent with your understanding.

5. For every page produced to DESC that contains confidential information, the page is to be marked “CONFIDENTIAL” in the header. Any specific information which you designate as confidential information must also be marked by notation, highlighting, or other conspicuous means.

6. “Party” is defined as the United States Department of Defense and all Other Federal Executive Agencies.

Document and Information Requests

DESC 1-1. Please provide a list of the names of the witnesses the Party intends to call and the subject matter for which each witness intends to testify at the hearing in this matter, including but not limited to expert witnesses and witnesses that the Party intends to use to provide surrebuttal testimony, if any.

DESC 1-2. Please provide an electronic copy in the original format—i.e., Excel (with all formulas intact) or Word—of the exhibits and appendices attached to any filed testimony of all witnesses.

DESC 1-3. Please provide copies of any correspondence, requests for information, and responses, oral or written, including but not limited to those made or received in electronic format, to or from any other party in this docket.

DESC 1-4. Please provide copies of all source documents, articles, cited documents listed in footnotes, regulatory decisions, work papers, and other sources used in the development

and preparation of the testimony, exhibits, and appendices of the written testimony of any expert witness filed in this case.

DESC 1-5. Please provide Microsoft Excel copies (with formulas intact) of any and all and supporting workpapers or documents, data, tables, charts, source documents, and regression results and statistical tests used in the development and preparation of the testimony, exhibits, and appendices of any witness for whom you have filed or will file written testimony in this case.

DESC 1-6. Please provide (or identify if provided to you by DESC) copies of all documents, analyses, articles, reports, work papers, regulatory decisions, and other materials provided by you to any expert witness for whom the Party has filed or intends to file written testimony in this case.

DESC 1-7. Please provide in original format—i.e., pdf, Excel (with all formulas intact), or Word—all documents, analyses, articles, reports, work papers, regulatory decisions, and other materials supporting the written testimony of any witness that analyzes, discusses, or proposes adjustments to any of the calculations, adjustments, amounts, or other financial or accounting information set forth in the Application or otherwise proposed by the Company.

DESC 1-8. Please provide copies of any and all responses provided or received by the Party in this proceeding to any party or intervenor (other than DESC) in response to any interrogatory or request for the production of documents and things.

DESC 1-9. Please provide copies of any and all responses provided or received by the Party with respect to a subpoena issued in this proceeding.

DESC 1-10. As to each outside witness appearing on your behalf in this proceeding and for each regulatory proceeding in which that witness has appeared during the past three years,

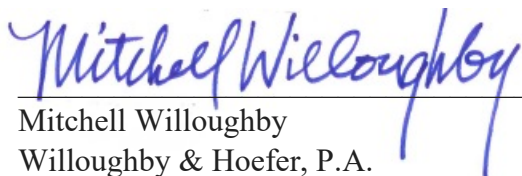
please identify the proceeding and provide any and all reports, prefiled testimony, hearing transcripts, and all associated exhibits, and provide a citation to the resulting orders on the merits.

DESC 1-11. As to each outside witness appearing on your behalf in this proceeding and for each regulatory proceeding in which that witness has appeared during the past three years, please identify the proceeding and provide any and all reports, prefiled testimony, hearing transcripts, and all associated exhibits, and provide a citation to the resulting orders on the merits where the witness took a position different from or contrary to the position taken in this proceeding.

[SIGNATURE BLOCK ON NEXT PAGE]

Respectfully submitted,

K. Chad Burgess
Matthew W. Gissendanner
Dominion Energy South Carolina, Inc.
Mail Code C222 220
Operation Way
Cayce, SC 29033
(803) 217-8141
kenneth.burgess@dominionenergy.com
matthew.gissendanner@dominionenergy.com



Mitchell Willoughby
Willoughby & Hoefer, P.A.
P.O. Box 8416
Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Michael Anzelmo
McGuireWoods LLP
1301 Gervais Street, Suite 1050
Columbia, SC 29201
(803) 251-2313
manzelmo@mcguirewoods.com

Belton T. Zeigler
Kathryn S. Mansfield
Womble Bond Dickinson (US) LLP
1221 Main Street, Suite 1600
Columbia, SC 29201
(803) 454-6504
belton.zeigler@wbd-us.com
kathryn.mansfield@wbd.us.com

October 22, 2020
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E

IN RE:)	
Application of Dominion Energy South)	
Carolina, Incorporated for Adjustment of)	CERTIFICATE OF SERVICE
Rates and Charges)	
)	

This is to certify that I have this date caused to be served one (1) copy of **Dominion Energy South Carolina's First Set of Written Interrogatories and Request for Production of Documents and Things to the United States Department of Defense and all other Federal Executive Agencies** on behalf of Dominion Energy South Carolina, Inc. in the above-referenced matter upon the persons named below via electronic mail:

Adam Protheroe, Esquire
S.C. Appleseed Legal Justice Center
adam@scjustice.org

Emily W. Medlyn, Esquire
U.S. Army Legal Services Agency -
Regulatory Law
emily.w.medlyn.civ@mail.mil

Alexander G. Shissias, Esquire
The Shissias Law Firm, LLC
alex@shissiaslawfirm.com

Frank Knapp, Jr
fknapp@knappagency.com

Alexander W. Knowles, Counsel
Office of Regulatory Staff
aknowles@ors.sc.gov

John B. Coffman, Esquire
John B. Coffman, LLC
john@johncoffman.net

Andrew M. Bateman, Counsel
Office of Regulatory Staff
abateman@ors.sc.gov

Robert Guild, Esquire
Robert Guild - Attorney at Law
bguild@mindspring.com

Carri Grube Lybarker, Esquire
S.C. Department of Consumer Affairs
clybarker@scconsumer.gov

Roger P. Hall, Esquire
SC Department of Consumer Affairs
rhall@scconsumer.gov

Christopher M. Huber, Esquire
Office of Regulatory Staff
chuber@ors.sc.gov

Derrick Price Williamson, Esquire
Spilman Thomas & Battle, PLLC
dwilliamson@spilmanlaw.com

Dorothy E. Jaffe, Counsel
Sierra Club
dori.jaffe@sierraclub.org

Scott Elliot, Esquire
Elliot & Elliot, PA
selliot@elliottlaw.us

Stephanie Eaton, Esquire
Spilman Thomas & Battle, PLLC
seaton@spilmanlaw.com

Steven W. Hamm, Esquire
Office of Regulatory Staff
shamm@ors.sc.gov



Laura Lee Andrews

October 22, 2019
Columbia, South Carolina